

SIVE, PAGET & RIESEL, P. C.

460 PARK AVENUE
NEW YORK, N.Y. 10022

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Nov 19 8 05 AM '86

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LAURA ZEISEL
RESIDENT ATTORNEY

CABLE: SPARESO
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TELEX: 1561283

November 14, 1986

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A. A. CHERTOK
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JAMES J. JACOBY
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STEVEN E. MAGID
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JOAN M. FERRETTI
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*N.J. AND D.C. BAR ONLY

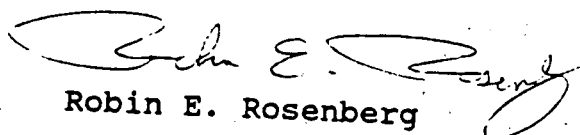
Freedom of Information Officer
United States Environmental
Protection Agency
Region IX
215 Fremont Street
San Francisco, CA 94105

Dear Sir or Madam:

This is a request pursuant to the Freedom of Information Act. In accordance with that Act, I request copies of all documents (including, but not limited to, correspondence, notes, orders, directives, reports, notifications, opinions or studies) in your files relating to leaks, spills, releases or other discharges of chemicals, wastes, or other hazardous substances since January 1979 at the site of the secondary lead smelting and processing plant located at 2700 South Indiana Street, Vernon, California in the County of Los Angeles. The plant is presently owned by GNB Incorporated and, formerly, by Gould Inc.

We will pay all reasonable search and copying costs for these materials. As this request involves a matter of some urgency, I ask your earliest consideration of this request and would appreciate it if you would contact me as soon as possible to inform me of the estimated response date.

Very truly yours,


Robin E. Rosenberg

RER:bam
3200\00006

Gould Inc Metals
CAD 097 854 541

11/25/86

LOG OF DOCS IN
FILE

CAD 09 785 4541

GOULD INC METALS

1. PRELIMINARY ASSESSMENT SUMMARY
2. SITE BACKGROUND / EVENTS 2 PAGES
3. MAINTENANCE FORM 10/18/85 11 PAGES
4. PRELIMINARY ASSESSMENT 01/17/84 3 PAGES
5. PRELIMINARY ASSESSMENT 01/17/84 (NOTATIONS DIFFER) 3 PAGES
6. SITE DRIVE-BY INSP 09/21/84 4 PAGES
7. NOTIFICATION OF HAZ WASTE SITE 2 PAGES
8. NOTIFICATION OF HAZ WASTE SITE 2 PAGES
9. FIRE DPT / HAZ MAT INCIDENT 10/13/83
10. FIRE DPT / FIRE INCIDENT 10/13/83 4 PAGES
11. LETTER DOHS TO GOULD 3/22/82
12. LETTER EPA TO GOULD 1/18/82
13. CITATION 2/8/73 2 PAGES
14. HAZ WASTE DISP REPORT 3/1/83
15. EPA GEN INF (FORM 3510-1) 7 PAGES
16. NOTIFICATION HAZ WASTE (FORM 8700-12) 2 PAGES
17. LETTER FOIA REQUEST & MEMO 3/14/86 2 PAGES
18. LETTER CA RWQCB TO GNB BATTERIES 12/03/84 4 PAGES
19. LETTER GOULD TO DOHS 7/7/80 2 PAGES
20. CHEMICAL ANALYSIS 8/20/80 3 PAGES
21. HAZ WAST SURVEILLANCE REPORT 6/2/80 2 PAGES
22. MEMO 4/17/85
23. MEMO OF CALL 2/2/84 2 PAGES
24. MEMO OF CALL 10/5/84
25. MEMO OF CALL 9/13/84
26. MEMO OF CALL 8/27/84
27. MEMO OF CALL 4/19/85
28. MEMO 8/14/84
29. RESPONDENT CONTACT RECORD 9/15/83 2 PAGES

CAJ 9785 4541

SIVE, PAGET & RIESEL, P.C.

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March 14, 1986

Ms. Melanie Blaha
Freedom of Information Officer
United States Environmental Protection
Office
Region IX
215 Fremont Street
San Francisco, CA 94105

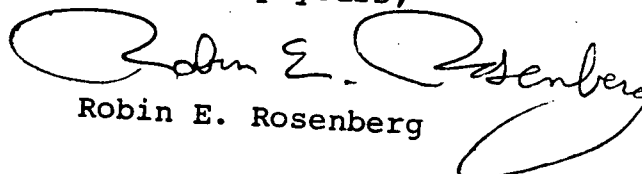
Dear Ms. Blaha:

This is a request pursuant to the Freedom of Information Act. I hereby request copies of all documents in your file since April 1985, including letters to or from the owners or operators of the site described below and all other correspondence, evaluations, remedial investigations/feasibility studies, opinions, reports, orders and demands for payment of response costs relating to hazardous waste and/or toxic and pollution problems and the Comprehensive Environmental Response Compensation Liability Act with respect to the following site:

Secondary lead smelting and processing plant
in Vernon, County of Los Angeles, California,
GNB, Inc. GNB, Inc. was formerly owned by
Gould, Inc.

We are willing to pay reasonable search and copying costs for these materials. As this request involves a matter of some urgency I ask you earliest consideration of this request and would appreciate it if you would contact me as soon as possible to inform me of the estimated response date.

Very truly yours,


Robin E. Rosenberg

RER:bam

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD—
LOS ANGELES REGION

107 SOUTH BROADWAY, SUITE 4027
LOS ANGELES, CALIFORNIA 90012-4596
(213) 620-4460

Hanson
*Roy: Is this
an ISD?*



December 3, 1984

Mr. Bob Smith
Director of Operations
GNB Batteries
2700 South Indiana Street
Los Angeles, CA 90023

GNB STORM WATER RETENTION POND, VERNON CALIFORNIA

On November 1, 1984 at a meeting with you and Mr. Randolph Harris of Kleinfelder and Associates and at a follow-up tour of your facility with Kent Hudson and yourself we discussed the Kleinfelder report submitted for a proposed rainwater runoff retention pond at your facility in Vernon.

The following are the recommendations and requirements that came out of those meetings:

1. A comprehensive workplan should be submitted as early as possible to expedite the continuation of construction. It should incorporate, appropriate recommendations and requirements that follow.
2. Preliminary Report: We require additional information as to background water data, geology, hydrogeology as to aquifer systems, groundwater flow in the upper and lower aquifers, groundwater gradient, construction of wells and a history of the site.

Specific items to be included:

- a) A map showing the location of all wells within the facility and the locations of all wells within one mile of the facilities perimeter. The report shall include, for each well, a description of the present use of the well, a representative water analysis of the well, and, when possible, the well log.
- b) An analysis of the vertical and lateral extent of the perched water and the water bearing strata which could be affected by leachate from the surface impoundment and the confining beds under and adjacent to the surface impoundment. This analysis should include the following:

- (1) Maps showing contours of equal elevation of the water surface for perched water, unconfined water, and confined water to be analyzed.
- (2) An estimate of the groundwater flow, direction of the perched water, and all the water bearing strata on both the maps and subsurface geologic cross sections.
- (3) An estimate of the transmissivity, permeability, and storage coefficient for each perched zone of water and water bearing strata identified on maps specified in paragraph 1.
- (4) A determination of the rate of groundwater flow.
- (5) A determination of the water quality of each waterbearing strata and perched water which is identified on the maps specified in paragraph (1) and which is under, or adjacent to, the facility.
- c) An indication as to whether the groundwater is contiguous with regional bodies of groundwater and the depth measured to the groundwater.
- d) A description of the composition of the vadose zone beneath the surface impoundment. The description shall include a chemical and hydrogeological characterization of both the consolidated and unconsolidated material underlying the impoundment. The description shall also include soil moisture readings from a representative number of points around the surface impoundment perimeter and at a maximum depth of the surface impoundment.
- e) A description of monitoring to be done to detect leachate, including vadose zone monitoring, the number and positioning of the monitoring wells, the monitoring wells' distances from the surface impoundment, the monitoring wells' design data, the monitoring wells' installation and development procedures, the sampling methodology, the sampling frequency, the chemical constituents analyzed, and the analytical methodology. The design data of the monitoring wells shall include the monitoring wells' depth, diameters, casing materials, perforated intervals within the well, the size of the perforations, the gradations of the filter pack, and the extent of the wells' annular seals.
- f) All initial sampling of groundwater should be a complete analysis including priority pollutants.

- g) The locations and contents of any underground storage tanks located at the facility.
3. History of the site. As complete a history as possible of the site is required. Past owners and past practices including disposal, spills and cleanups, and water sampling analysis will help establish areas of concern and a background. Should any problem occur in the future, it will be easier to determine if it was caused by past or current operations as well as any modifications to be made prior to continuation of the proposed runoff control facilities.

We have two files on National Lead and Gould Industries, previous owners of the property. You may have access to these to facilitate a compilation of the history of the site.

A brief outline of the files contents is attached.

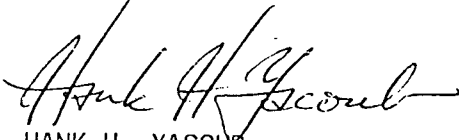
4. Site Construction. The plan has been revised and our recommendations and requirements follow:
- a) Shallow monitoring wells should be maintained and be used for vadose zone sampling.
 - b) Deep wells constructed shall be a minimum of 4 inches in diameter and relocated as proposed on November 20, 1984.
 - c) The double liner system shall have an inner liner of a minimum 40 mils in thickness and an outer liner of a minimum of 3 feet compacted clay with permeability less than or equal to 1×10^{-7} cm/sec or another synthetic liner of a minimum 40 mils in thickness over a compacted base as proposed.
 - d) Include a construction quality control plan to assure proper supervision, workmanship and certification of as-built plans and drawings for the pond, monitoring wells and facilities drainage system.

Further recommendations and requirements may be made upon receipt and analysis of your workplan.

Staff has determined your retention pond will be subject to this Board's Waste Discharge Requirements. Enclosed is an application for a waste discharge permit to be completed and filed with the appropriate filing fee.

Mr. Bob Smith
Page 4
December 3, 1984

If you have any further questions regarding this matter please call me at
(213) 620-4397 or Alexander MacDonald at (213) 620-5436.



HANK H. YACOUB
Supervising Water Resource
Control Engineer

AM/sml

Enclosure

cc: Department of Health Services, Toxic Substance Control Division
ATTN: John Hinton

March 22, 1982

Mr. Douglas Weber
Environmental Coordinator
Gould Inc., Metals Division
2700 South Indiana Street
Los Angeles, CA 90023



Dear Mr. Weber:

On February 2, 1982, you requested that the California State Department of Health Services (DOHS) rescind Interim Status Document (ISD) No. CAD097854541, issued for your company's Los Angeles facility. You made the following statements (paraphrased here) in support of your request:

- The only hazardous waste that your company produces is secondary lead smelter baghouse dust.
- Your company is installing a new smelter which will recycle the baghouse dust such that the hazardous waste will no longer be stored at your facility for more than 60 days.
- You will notify us in writing when the new smelter begins operation.

Please be advised that the DOHS has reviewed your request and has made the following determinations:

- We will rescind your ISD effective on the date of receipt of written notification that the new smelter has begun operation.
- Although we have rescinded your ISD, your company will still be a producer of hazardous wastes and as such has the responsibility of handling those wastes properly (e.g., use of the manifest, use of a registered hazardous waste hauler, etc.).

If you have questions concerning this letter, please write or call.

Sincerely,

William F. Jopling
William F. Jopling, Acting Chief
Permits, Surveillance and
Enforcement Section
Hazardous Waste Management Branch

Pls prepare response.

*Evaluate GNB's
argument; confer w/
R McCrohan & if
necessary with Bob
McCormick - Seabro.*

Thamp

6/3

P-2

*check if Gould is a
TSDF (listed)*

DOHS

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Environmental Protection Agency
Region IX
215 Fremont St.
San Francisco, CA. 94105

FEB 18 1982

Mr. Douglas Weber
Environmental Coordinator
Gould Inc., Metals Division
2700 Indiana Street
Los Angeles, CA 90023

RE: Los Angeles Facility (EPA ID# CA097854541)

Dear Mr. Weber:

We have reviewed your request for withdrawal of your permit application for the facility referenced above, submitted pursuant to Section 3005 of the Resource Conservation and Recovery Act. In accordance with your request, we are returning the documents which you submitted.

Should it be necessary for you to re-apply for a hazardous waste facility permit, you should contact us for the procedures to be followed.

Sincerely,

Original Signed by:
William D. Wilson
Toxics & Waste Management Division

Enclosure

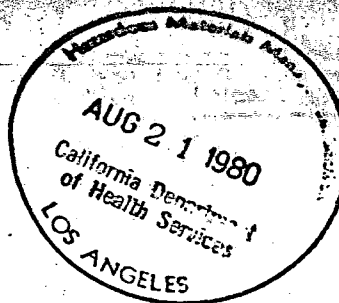
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Rev.jd 2/9

CONCURRENCES

SYMBOL	T-2-2						
SURNAME	W.D. Wilson						
DATE	2/11/82						

TELEPHONE: (213) 620-2980

August 20, 1980




Mr. Louis Hauger, Director of Environmental Health
Vernon City Health Department
4505 Santa Fe Avenue
Vernon, California 90058

Dear Lou:

Attached for your information is a copy of the results of chemical analyses made on a water sample collected by R. Hilton of your staff from the well at Gould Metals in Vernon.

No lead or arsenic was detected.

Sincerely,


William J. MacPherson
District Sanitary Engineer

cc: Regional Water Quality Control Board - Los Angeles Region
Hazardous Materials Section ✓

FIELD DATA

SYSTEM Gould Metals 270-5, Indiana
AREA SERVED Industrial
SAMPLING POINT Well
LABORATORY State Dept Health Service
SYSTEM NUMBER _____ STATE WELL NO./STATION NO. T YR. MO. DAY 800730

D T LAB SAMPLE NO. _____
Duplicate All Cards

TIME(PST) 1330 FIELD TEMP. U

FIELD E.C. _____ FIELD pH _____ D.O. _____ DISCHARGE (CFS) _____ G.H. (FEET) _____ DEPTH(FT) _____ SAMPLER NO. _____

CHEMICAL ANALYSES RESULTS
In Milligrams Per Liter Unless Otherwise Indicated

LAB. CODE NO. _____ CARD 1

TOTAL HARDNESS as CaCO₃ 270 CALCIUM 73 MAGNESIUM 21 SODIUM 45.5 POTASSIUM 28

ALKALINITY as CaCO₃ HCO₃⁻ 204 CO₃⁻ 0 pH 7.9 SULPHATE 699 CHLORIDE 57 NITRATE AS NO₃ 25 Card 2

FLUORIDE 0.5 BORON _____ TURBIDITY(RAW WATER) Code: _____ TOTAL DIS. SOLIDS T: 180°C = 8 105°C = 5 T 457 SPECIFIC CONDUCTANCE μmhos/cm Card 3

ARSENIC 60005 D/T _____ BARIUM _____ D/T _____ CADMIUM _____ D/T _____ CHROMIUM _____ D/T _____

COPPER _____ D/T _____ IRON 007 D/T _____ LEAD 6001 D/T Card 2

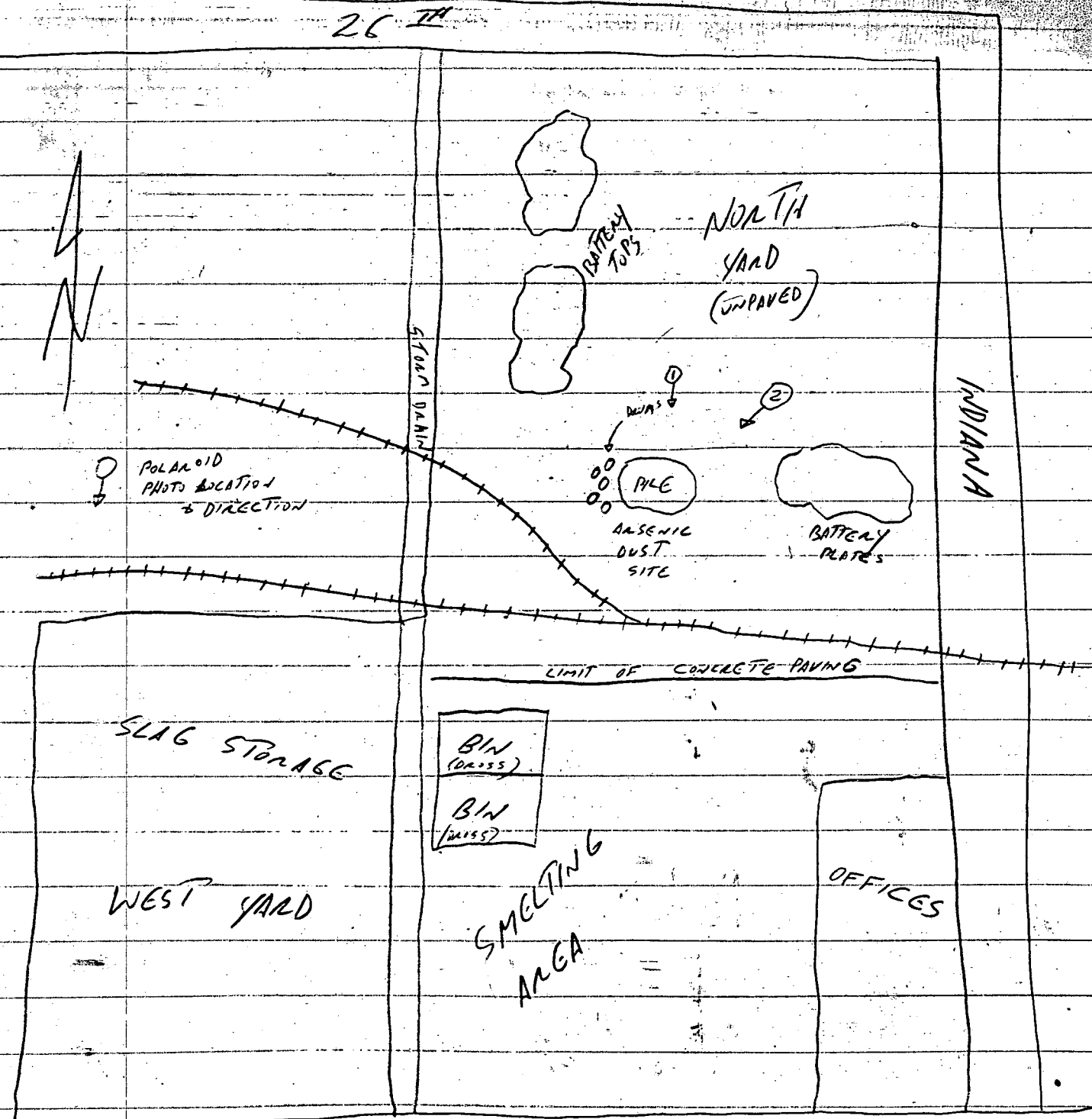
MANGANESE 002 D/T _____ MERCURY _____ D/T _____ SELENIUM _____ D/T _____ ZINC _____ D/T Card 3

PROGRAM NO. 295

PROGRAM NO. 295 MI

Good picture location

26 III



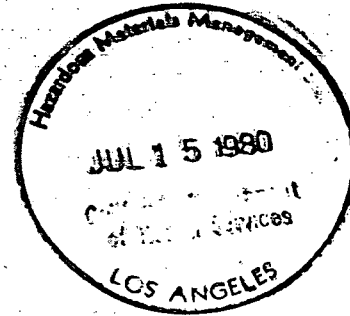
BANDWIT

DOHS

July 7, 1980

Department of Health Services
Hazardous Materials Management Section
1449 West Temple Street
Los Angeles, CA 90026

Attn: Mr. Miller E. Chambers



Gentlemen:

This is a request for a permit to transport extremely hazardous waste to a disposal site. The particulars are as follows:

1. Location of the waste:

Gould Inc., Metals Division
7200 South Indiana Street
Los Angeles, CA 90023

2. Arsenic Fume, approximately 75 tons. Chemical composition:
As-56.95%; Sb-1.08%; Cl-0.51%; Sn-Nil; remaining 41.66%
inert materials.

3. The material, previously piled and tarped, was placed
into DOT approved 55 gallon drums and sealed. The material
was wetted during handling to reduce dust generation and
upon completion of drumming, the soil beneath the pile will
be scraped to a depth of 2" and the scrapings will be
drummed also. Five soil samples will be made to insure
under the pile center and 10' out in each cardinal direction.
The material will be shipped to a class I dump for disposal.

4. The registered hauler is:

Gould Inc., Metals Division
2700 South Indiana Street
Los Angeles, CA 90023
(213) 262-1101

Reg # 534

7/1/80 State office must be notified
RE: Vehicle license number

5. The disposal site is:

temporarily closed
Calabasas Landfill #5
26919 Vemtura Blvd.
Los Angeles, CA 91301
(213) 889-1430

Hold - See M.E.C.

3-1072

7/1/80
Hold for M.E.C.

11/81

Page Two

July 7, 1980

Letter to: Department of Health Services
Los Angeles, CA

GOULD

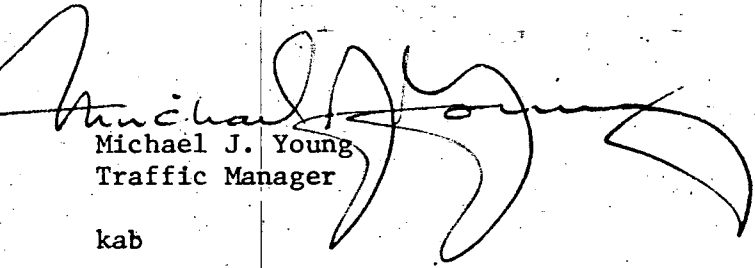
6. Please send the permit to:

Mr. Doug Weber
Gould Inc., Metals Division
2700 South Indiana Street
Los Angeles, CA 90023

with a copy of said permit to the undersigned.

Please contact the undersigned should you have any questions
regarding the above.

Sincerely,



Michael J. Young
Traffic Manager

kab